

**THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**SECOND SET OF INFORMATION REQUESTS OF
ALLEGIANCE TELECOM OF MASSACHUSETTS, INC. TO
VERIZON MASSACHUSETTS**

D.T.E. 02-8

Pursuant to 220 C.M.R. 1.06(b)(c), Allegiance Telecom of Massachusetts, Inc. (“Allegiance”) submits to Verizon Massachusetts (“Verizon” or “Verizon MA”) the following information requests.

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Verizon or to any individual or entity sponsoring testimony or retained by Verizon to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as may be available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response that is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If Verizon cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why Verizon cannot answer the Request in full, and state what information or knowledge is in Verizon's possession concerning the unanswered portions.
10. If, in answering any of these Requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide Allegiance with the responsive documents, and or which directs Allegiance to inspect documents at any location is not responsive.

13. If you refuse to respond to any Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide two copies of each response.
16. Unless the Request specifically provides otherwise, the term "Verizon" refers to Verizon MA's intrastate operations and includes all witnesses, representatives, employees, and legal counsel.
17. Please provide all responses to requests within 10 business days from receipt of request, as established by the Hearing Officer's Ground Rules dated February 27, 2002.

INFORMATION REQUESTS

AL-VZ-2-1: In your response to AL-VZ-1-24, you state:

“The following security measures were taken Company-wide since September 11th:

- ?? Company facility protection was greatly increased
- ?? 24 X 7 guard coverage was instituted at certain critical locations
- ?? Guard force was upgraded at critical locations, *i.e.*, experience levels of guards
- ?? Armed guards were posted at certain critical facilities
- ?? Supervision of guard force was upgraded
- ?? Verizon Security personnel were assigned to critical buildings to oversee security and perform security reviews (approximately 1,000 locations visited per week)
- ?? Access control at Verizon facilities was strengthened/reinforced
- ?? Verizon IDs were scrutinized
- ?? Bag, parcel searches were conducted
- ?? Visible Verizon ID badge policy was enforced, and employees were encouraged to challenge personnel without visible IDs
- ?? Mail Security Guidelines were developed and implemented
- ?? Response protocol was developed”

For each measure listed above, please provide the following:

- (a) The approximate cost of implementing the measure, on whatever basis such information is available or ascertainable through reasonable efforts (e.g., per central office, per state, per Verizon region, or for the company as a whole);
- (b) The approximate cost of implementing the measure in Massachusetts;
- (c) A description of how Verizon is recovering or plans to recover the costs it incurs in taking each measure;
- (d) The name of the Verizon employee primarily responsible for implementing each measure in Massachusetts;
- (e) Any and all documents related to the implementation of each measure;
- (f) A description of any metrics or other criteria Verizon has adopted or plans to adopt to assess its success in implementing each measure and, to the extent any data related to such metrics or other criteria has been generated, produce copies of such data;

- (g) The critical locations in Massachusetts at which 24 X 7 guard coverage was instituted;
- (h) The critical buildings in Massachusetts to which Verizon security personnel were assigned to oversee security and perform security reviews and the results of any such reviews.

AL-VZ-2-2: In AL-VZ-1-23, in response to the question “Does Verizon believe that any cost/benefit analysis should be applied to the proposed measures,” Verizon responded “No.”

(a) If the benefits of a measure as compared to its cost should not be a factor in the Department’s consideration of additional security measures, what criteria do you believe the Department should apply in choosing among various proposals that might be presented to it in this proceeding?

(b) If Verizon does not believe cost/benefit analysis should be used with respect to security measures, is it Verizon’s position that it has already implemented all technically feasible security measures in its Massachusetts central offices? If Verizon has not implemented all technically feasible security measures in its Massachusetts central offices, please identify each such technically feasible security measure that has not been implemented and, for each, state the reason that measure has not been implemented.

AL-VZ-2-3: In response to XO-VZ-1-4, Verizon states:

“The preliminary criteria described in Verizon MA’s panel testimony is intended as the basis for the Department and the Company to develop a framework for identifying those critical offices. Verizon MA anticipates that a small number of COs (*e.g.*, only a handful) would be designated as critical.”

Is it Verizon’s position that a CO could be designated as critical based solely on the identity and nature of a Verizon customer or customers served from that CO?

AL-VZ-2-4: Is the use of biometric feedback devices to authenticate access authority technically feasible in any Massachusetts central office in which CLECs are currently collocated? If so, why have such devices not been installed in those central offices?

AL-VZ-2-5: Is there any device or security measure of which Verizon is aware that would alert Verizon to the presence of a door to a secure area in a central office that has been improperly propped open (whether by CLEC or Verizon personnel or vendors)? If so, please identify such device or security measure and state whether it would be technically feasible to install such device or implement such security measure in any Massachusetts central office in which CLECs are currently collocated. If such a device or security measure does exist and it would be technically feasible to install such device or implement such security measure in any Massachusetts central office in which CLECs are currently collocated, please state whether the device or security measure has, in fact, been installed or implemented in any Massachusetts central office. If not, please state why such device or security measure has not been installed or implemented in any Massachusetts central office.

AL-VZ-2-6: Is there any device or security measure of which Verizon is aware that would prevent former Verizon employees from using an ID or access card to gain unauthorized access to a central office after his or her Verizon employment has ended? If so, please identify such device or security measure and state whether it would be technically feasible to install such device or implement such security measure in any Massachusetts central office in which CLECs are currently collocated. If such a device or security measure does exist and it would be technically feasible to install such device or implement such security measure in any Massachusetts central office in which CLECs are currently collocated, please state whether the device or security measure has, in fact, been installed or implemented in any Massachusetts central office. If not, please state why such device or security measure has not been installed or implemented in any Massachusetts central office.

AL-VZ-2-7: Is there any device or security measure of which Verizon is aware that would prevent employees (whether Verizon or CLEC) or vendors from engaging in the practice described in Verizon's panel testimony as "tailgating?" If so, please identify such device or security measure and state whether it would be technically feasible to install such device or implement such security measure in any Massachusetts central office in which CLECs are currently collocated. If such a device or security measure does exist and it would be technically feasible to install such device or implement such security measure in any Massachusetts central office in which CLECs are currently collocated, please state whether the device or security measure has, in fact, been installed or implemented in any Massachusetts central office. If not, please state why such device or security measure has not been installed or implemented in any Massachusetts central office.

AL-VZ-2-8: If Verizon's proposals as set forth in its Panel Testimony were adopted by the Department, would the following statements be true or false. If any statement is false, in whole or in part, please state why it is false.

- (a) If a CLEC requests physical collocation in a central office, and there is no separate, secure space available for such physical collocation, the CLEC's request for physical collocation would be denied.
- (b) If a CLEC requests physical collocation in a central office, and there is separate secure space available for such physical collocation but no route by which the CLEC can gain access to that space without entering secure Verizon space, the CLEC's request for physical collocation would be denied.

AL-VZ-2-9: In response to AL-VZ-24, Verizon states that since September 11, 2001, on a Company-wide basis Verizon has added "24 X 7 guard coverage" at certain critical locations. In its supplemental response to AL-VZ-1-4, Verizon indicates that it uses security guards at 7 locations in Boston and Cambridge.

- (a) Please indicate when Verizon first began using guards at the 7 locations listed in its supplemental response to AL-VZ-1-4.

(b) Please indicate whether the post-September 11th “24X7 guard coverage” described in Verizon’s response to AL-VZ-24 refers to facilities in Massachusetts other than the 7 facilities listed in Verizon’s supplemental response to AL-VZ-1-4. If so, please indicate how many Verizon facilities in Massachusetts – other than the 7 facilities listed in Verizon’s supplemental response to AL-VZ-1-4 - were staffed by “24X7” security guards after September 11th and how many of those Massachusetts facilities still use “24X7” security guards today.

AL-VZ-2-10: In Verizon’s supplemental response to AL-VZ-1-4, Verizon states that “although security guards may not be assigned to other Massachusetts COs, Verizon technicians are present in the collocated COs.” Please indicate if the Verizon technicians described in this supplemental response fulfill all or part of the role of security guards present in other facilities, and, if so, how. Also, are any of the collocated COs where Verizon technicians, but not security guards, are present still considered “unmanned” as that term is defined in Verizon’s collocation guidelines (i.e., “An unmanned building is any VZ central location that does not have a permanent employee assigned between the hours of 8am – 5pm, Monday through Friday”)?